

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 21-
v.	:	DATE FILED:
TERRELL ASHBY,	:	VIOLATIONS:
a/k/a "Jason Brandon"	:	18 U.S.C. §§ 2261A(2)(B) and 2261(b)(3)
	:	(Cyberstalking resulting in serious bodily
	:	injury – 1 count)
	:	18 U.S.C. § 2261A(2)(B) (Cyberstalking
	:	– 1 count)
	:	18 U.S.C. § 875(d) (Extortion – 2 counts)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

Background

1. At all times material to this Indictment:
 - a. Provider A was a social-media platform and Provider B was an electronic messaging application. Both Providers A and B provided users the ability to engage in private conversations, with chat and/or video, and to publish content viewable by other users.
 - b. Provider C and Provider D were peer-to-peer payment processing applications that enabled users to transfer money over the internet.

2. Defendant TERRELL ASHBY, using fictitious profile names such as “Jason Brandon,” “jbrand0n.1993,” and “jasonbrandon199,” contacted women via social media platforms, soliciting them to send him nude or partially nude photos or videos of themselves. Defendant ASHBY falsely promised to pay the women, but instead he took screenshots of the women, while nude or partially nude, without their knowledge or consent.

3. Defendant TERRELL ASHBY then contacted the women whose nude or partially nude photos he had surreptitiously taken, and he attempted to extort money from them, threatening to expose them and their photos if they refused to pay.

Overt Acts

4. On or about August 21, 2020, defendant TERRELL ASHBY, using the assumed name “Jason Brandon,” interacted online with a 20-year-old female who was residing in the Eastern District of Pennsylvania (“Victim 1”). Defendant ASHBY originally sent Victim 1 a message on Provider A’s platform, offering Victim 1 a large sum of money. In response, Victim 1 asked what ASHBY would pay her for, and ASHBY asked Victim 1 to switch platforms and communicate with him on Provider B’s platform. Victim 1 agreed and exchanged a number of messages with ASHBY on Provider B’s platform.

5. On or about August 22, 2020, at defendant TERRELL ASHBY’s request, Victim 1 engaged in a nude video chat with defendant ASHBY on Provider B’s platform. Unbeknownst to Victim 1, ASHBY recorded portions of their video chat. ASHBY subsequently sent Victim 1 multiple messages via Provider B demanding \$40 in exchange for deleting a nude photo he had captured of her.

6. In response to defendant TERRELL ASHBY's demands, Victim 1 paid him \$40 by transferring money via Provider C's online payment platform to an account provided by defendant ASHBY.

7. Defendant TERRELL ASHBY then sent Victim 1 multiple messages via Provider B demanding all of the money in Victim 1's bank account. In these messages, defendant ASHBY threatened to disseminate the nude photos of Victim 1 to her college and other social media friends and followers if she did not pay him more money.

8. As a result of defendant TERRELL ASHBY's conduct, Victim 1 became substantially emotionally distraught and ingested a number of prescription pills. She was rushed to an emergency room in an ambulance and ultimately recovered.

9. While Victim 1 was hospitalized, on August 22, 2020, defendant TERRELL ASHBY began to carry through with some of his threats to disseminate sexually explicit photos of Victim 1, and began advertising the nude photos of Victim 1 using various accounts on Provider A and Provider B.

10. On September 1, 2020, defendant TERRELL ASHBY again advertised Victim 1's nude photos by creating another new account on Provider B's platform, with username "[Victim 1]2020" and vanity name "[Victim 1]NUDES.EXPOSED."

11. On November 1, 2020, defendant TERRELL ASHBY, using a new account on Provider A's platform, sent another extortionate message to Victim 1. The message read as follows:

Remember those pics you sent me and I posted and that [video chat] i screenrecorded? I'm not stopping until you send what you owe[.] I [messed] 50 people you follow the pics you sent me[.]

12. From on or about August 21, 2020 through on or about November 1, 2020, in the Eastern District of Pennsylvania, and elsewhere, defendant

**TERRELL ASHBY,
a/k/a/ "Jason Brandon,"**

with the intent to injure, harass, and intimidate a person known to the grand jury as Victim 1, used a facility of interstate and foreign commerce, that is, the internet, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victim 1, such conduct resulting in serious bodily injury to Victim 1.

In violation of Title 18, United States Code, Sections 2261A(2)(B) and 2261(b)(3).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 11 of Count One of this Indictment are incorporated by reference and realleged as if set forth fully herein.
2. On or about August 22, 2020, in the Eastern District of Pennsylvania, and elsewhere, defendant

**TERRELL ASHBY,
a/k/a/ "Jason Brandon,"**

with intent to extort money from a person known to the grand jury as Victim 1, knowingly transmitted in interstate and foreign commerce from Virginia to Pennsylvania, a communication containing a threat to injure the reputation of Victim 1.

All in violation of Title 18, United States Code, Section 875(d).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count One of this Indictment are incorporated by reference and realleged as if set forth fully herein.

Overt Acts

2. On or about June 28, 2020, defendant TERRELL ASHBY, using the assumed name "Jason Brandon," interacted online with a 21-year-old female who was residing in the Eastern District of Pennsylvania ("Victim 2"). Defendant ASHBY originally sent Victim 2 a message on Provider A's platform, offering Victim 2 a large sum of money. After exchanging a number of messages with Victim 2, ASHBY enticed her to communicate with him on Provider B's platform. Victim 2 agreed and began exchanging messages with ASHBY on Provider B's platform.

3. Once on Provider B's platform, defendant TERRELL ASHBY asked Victim 2 to send him nude photographs of herself and promised to send her money in return. Victim 2 agreed and sent approximately eight pictures of herself to defendant ASHBY, some partially nude and some fully nude.

4. Unbeknownst to Victim 2, defendant TERRELL ASHBY took screenshots of the nude pictures. Defendant ASHBY then sent Victim 2 multiple messages via Provider B demanding money and threatening to release the nude pictures if she did not pay him.

5. In response to defendant TERRELL ASHBY's demands, Victim 2 paid him \$25 by transferring money via Provider D's online payment platform to an account provided by defendant ASHBY.

6. On or about June 28, 2020, defendant TERRELL ASHBY sent Victim 2 additional messages via Provider B demanding more money.

7. On or about June 28, 2020, defendant TERRELL ASHBY created a new account on Provider A's platform using the profile name "[Victim 2]nudes" and sent Victim 2 an invitation to connect with this new shaming account.

8. On or about June 30, 2020, defendant TERRELL ASHBY sent Victim 2 additional invitations to connect with two more shaming accounts on Provider B's platform, with the profile names "zeta[Victim 2]nud20" and "[Victim 2]urfucked[.]"

9. From on or about June 28, 2020 through on or about June 30, 2020, in the Eastern District of Pennsylvania, and elsewhere, defendant

**TERRELL ASHBY,
a/k/a/ "Jason Brandon,"**

with the intent to injure, harass, and intimidate a person known to the grand jury as Victim 2, used a facility of interstate and foreign commerce, that is, the internet, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to that person.

In violation of Title 18, United States Code, Section 2261A(2)(B).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 8 of Count Three of this Indictment are incorporated by reference and realleged as if set forth fully herein.
2. On or about June 28, 2020, in the Eastern District of Pennsylvania, and elsewhere, defendant

**TERRELL ASHBY,
a/k/a/ "Jason Brandon,"**

with intent to extort money from a person known to the grand jury as Victim 2, knowingly transmitted in interstate and foreign commerce from Virginia to Pennsylvania, a communication containing a threat to injure the reputation of Victim 2.

All in violation of Title 18, United States Code, Section 875(d).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 875(d), as set forth in this Indictment, defendant

**TERRELL ASHBY,
a/k/a/ "Jason Brandon,"**

shall forfeit to the United States of America any property that constitutes, or is derived from proceeds traceable to the commission of such offenses, in accordance with Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2), and Title 28, United States Code, Section 2461(c).

2. If any of the above-described forfeitable property, as a result of any act or omission of the defendant

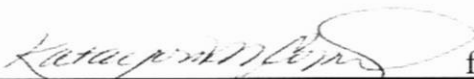
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

A TRUE BILL:



FOREPERSON



JENNIFER ARBITTIER WILLIAMS
Acting United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

TERRELL ASHBY

INDICTMENT

Counts

18 U.S.C. §§ 2261A(2)(B) and 2261(b)(3) (Cyberstalking resulting in serious bodily injury – 1 count);
18 U.S.C. § 2261A(2)(B) (Cyberstalking – 1 count); 18 U.S.C. § 875(d) (Extortion – 2 counts);
Notice of forfeiture

A true bill.



Grand Juror

Filed in open court this _____ day,
Of _____ A.D. 20 _____

Clerk

Bail, \$ _____
